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) Criminal No. 5:24-CR- 398 ( BKS )  
)  
) **Indictment**  
)  
)  
) Violations: 18 U.S.C. § 2251(a)  
) [Sexual Exploitation of a  
) Child]  
)  
) 18 U.S.C. § 2251(a)&(e)  
) [Attempted Sexual  
) Exploitation of a Child]  
)  
) 18 U.S.C. § 2252A(a)(2)(A)  
) [Distribution of Child  
) Pornography]  
)  
) 12 Counts  
)  
) County of Offense: Onondaga

**THE GRAND JURY CHARGES:**

**COUNTS 1-9**  
**[Sexual Exploitation of a Child]**

From in or about 2002 through in or about 2008, the exact dates being unknown but on separate and distinct occasions from each other, in Onondaga County in the Northern District of New York, the defendant, **WILLIAM SENECA, SR.**, did use, persuade, induce, and entice a minor, that is V1, a minor male born in 1993 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting such commerce, and where such visual depictions were actually transported and

transmitted using any means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18, United States Code, Section 2251(a).

<b>Count</b>	<b>Nature of Depiction</b>
<b>1</b>	One image of V1 naked sitting at the bottom of a staircase, depicting the lascivious exhibition of V1's genitals
<b>2</b>	Two images of V1 lying on a red duvet on a bed wearing gray underwear, depicting the lascivious exhibition of V1's genitals
<b>3</b>	Three images of V1 wearing a green zip up sweatshirt, depicting the lascivious exhibition of V1's genitals
<b>4</b>	One image of V1 lying on his back depicting the lascivious exhibition of V1's genitals
<b>5</b>	One image of V1 on his hands and knees wearing a t-shirt with his boxers pulled down depicting the lascivious exhibition of V1's anus
<b>6</b>	Two images of V1, depicting the lascivious exhibition of V1's genitals, with a fireproof lockbox depicted in the background of one of the images
<b>7</b>	One image of V1 sitting naked in a chair with an erection and the defendant, also nude, is standing next to V1 with the defendant's penis on or near V1's shoulder
<b>8</b>	One image of V1 sitting in a chair wearing a blue shirt with a flame design and no pants, depicting the lascivious exhibition of V1's genitals
<b>9</b>	One image of V1 with his shorts down around his ankles, depicting the lascivious exhibition of V1's genitals

**COUNTS 10-11**  
**[Attempted Sexual Exploitation of a Child]**

From in or about 2002 through in or about 2008, the exact dates being unknown but on separate and distinct occasions from each other, in Onondaga County in the Northern District of New York, the defendant, **WILLIAM SENECA, SR.**, did attempt to use, persuade, induce, and entice a minor, that is V1, a minor male born in 1993 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting such commerce, and where such visual depictions were actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18, United States Code, Section 2251(a) and (e).


Count	Nature of Depiction
10	Two images depicting V1 naked in a bathtub
11	V1 sitting in a chair wearing boxers with part of his genitals exposed to the camera

**COUNT 12**  
**[Distribution of Child Pornography]**

In or about 2002 through in or about 2008, in Onondaga County in the Northern District of New York, the defendant, **WILLIAM SENECA, SR.**, did knowingly distribute child pornography to another person using a means and facility of interstate and foreign commerce, shipped and transported in and affecting such commerce by any means, including by computer, in that the defendant, using the internet and a messaging application, distributed to at least one other person, one or more graphic image files depicting V1 engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).


Dated: September 25, 2024

A TRUE BILL,

  
Grand Jury Foreperson

CARLA B. FREEDMAN  
United States Attorney

By:

  
Michael D. Gadarian  
Assistant United States Attorney  
Bar Roll No. 517198